

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**  
*Pittsburgh Division*

<p>IN RE: <b>RONALD S. JONES</b></p> <p>Freedom Mortgage Corporation, Movant</p> <p>vs.</p> <p>RONALD S. JONES , Debtor</p>	<p>Case No. 17-22147-GLT Chapter 11</p> <p>Hearing Date: 3/2/2023</p> <p>Hearing Time: 10:30 AM</p>
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**CERTIFICATE OF SERVICE OF MOTION TO CONTINUE**

I certify under penalty of perjury that on this day, I served or caused to be served the Motion to Continue on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Donald R. Calaiaro, Esq.  
938 Penn Avenue, Suite 501  
Pittsburgh, PA 15222  
*Counsel for Debtor*

*Chapter 11 Trustee*

Office of the United States Trustee  
Liberty Center.  
1001Â Liberty Avenue, Suite 970  
Pittsburgh, PA 15222  
*US Trustee*

Via First Class Mail:

RONALD S. JONES  
3307 WATERFORD DRIVE  
PITTSBURGH, PA 15238  
*Debtor*

*Chapter 11 Trustee*

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading “Via CM/ECF electronic notice” and those served by mail will be listed under the heading “Via First Class Mail”.

EXECUTED ON: March 1, 2023

/s/Mario Hanyon  
Andrew Spivack, PA Bar No. 84439  
Matt Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
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PAWB Local Form 7 (07/13)

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<p>IN RE: <u>RONALD S. JONES</u></p> <p>RONALD S. JONES, Movant</p> <p>vs.</p> <p>Freedom Mortgage Corporation, Respondent</p>	<p>Case No. 17-22147-GLT Chapter 11</p> <p>Hearing Date: 3/2/2023 Hearing Time: 10:30 AM</p>
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**MOTION TO CONTINUE**

AND NOW COMES, Freedom Mortgage Corporation (the “Movant”), by its attorneys, Brock and Scott PLLC, and files this Motion To Continue hearing on Debtor’s Objection to Claim scheduled for 3/2/2023, representing as follows:

1. Debtor filed an Objection to Claim of Freedom Mortgage Company on January 4, 2023.

(Document No. 269)

2. Respondent filed a Response on February 6, 2023. (Document No. 271)
3. The parties have been communicating and expect to settle the Objection. .
4. The parties request a continuance of two weeks as additional time is needed for both parties to review Freedom’s updated pre and post-petition histories.
5. Debtor’s counsel has concurred to this Motion.

**WHEREFORE**, Movant respectfully requests that this Honorable Court:

1. Continue the hearing scheduled for 3/2/2023 for two weeks.

Date: March 1, 2023

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439  
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Mario Hanyon, PA Bar No. 203993  
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